### FREQUENT FILER MISTAKES

#### **COVER PAGE**

- \* Use the 12/2011 version of the OGE-278, not any earlier version. See <a href="http://www.oge.gov/Forms-Library/OGE-Form-278--Public-Financial-Disclosure-Report/">http://www.oge.gov/Forms-Library/OGE-Form-278--Public-Financial-Disclosure-Report/</a>
- \* We do not accept digital signatures, but we will accept hard copy, a fax or pdf. Don't forget to submit a signed cover page!
- \* Provide your EPA address, not a home address. Consider using a general EPA telephone number instead of your direct dial number. Remember, we must publish this form to the internet.

#### SCHEDULE A

- \* Do not include any personal identifying information on the form. Remove children's names, spouse name, account numbers, social security numbers, birth dates, street addresses for rental properties (but you still have to provide city, state). If you want, you may annotate your form by using "DC" for dependent child or "S" for spouse.
- \* If you organize your assets by using a "header" or "over-arching" account name, then think twice about whether the name itself is reportable. You do have to list the assets, of course, but it's possible that you might be able to say "Trust #1" instead of the name of your parent, or "IRA Account #1" instead of "Ameriprise IRA." What we need are the underlying assets, not necessarily the name of the account. That being said, we are still advising you that you do have to report the names of institutions where you hold cash accounts, savings accounts, CDs, or money market accounts, or any institution that holds your variable annuity, 401(k) or variable life insurance.
- \* You can aggregate accounts held in one institution.
  - EXAMPLE: If you have multiple cash accounts in SunTrust Bank (CDs, savings, checking), then you can just enter "SunTrust cash accounts" and aggregate the assets.
- \* Similarly, you can aggregate assets held in various accounts.
  - EXAMPLE: You and your spouse have separate IRAs. You both invest in ABC Mutual Fund as well as XYZ Corporation. Instead of listing the assets on four separate lines, you could instead enter "ABC Mutual Fund" on one line and aggregate your holdings, and then do the same on a second line for XYZ Corporation.
- \* You can aggregate accounts held in one institution.
  - EXAMPLE: If you have multiple cash accounts in SunTrust Bank (CDs, savings, checking), then you can just enter "SunTrust cash accounts" and aggregate the assets.
- \* We do not recommend that you provide account statements in lieu of Schedule A or B. However, if you choose to do so, then understand that we will have to publish that statement on the internet because it is part of your public form.
- \* Check ALL of the appropriate boxes for assets on Schedule A (i.e., valuation, type & amount of income). You must report accrued income, even if deferred or exempt for tax purposes. Income is reportable even if you didn't actually withdraw it out of an account, regardless of what kind of

account you have the asset in (e.g., tax deferred accounts such as an IRA) or if the income was reinvested. You can usually find this information from your tax return or from a statement from your broker or financial advisor.

- \* Report any individual source of income of more than \$200. If you sold completely an asset in 2011 that generated more than \$200 in income (i.e., dividends, interest and realized capital gains), then it's reportable on Schedule A as INCOME, even though you don't report it as an INVESTMENT you held as of the end of the calendar year. So you need to list the name of the asset, check off the valuation of "Zero or less than \$1001," and then mark the appropriate boxes for type (if it's not an Excepted Investment Fund) and amount of income.
- \* Fully describe the mutual fund or stock you own, either by providing the full name and/or by listing the five letter symbol. Don't write just "Vanguard" or "T. Rowe Price".
- \* Include college prepaid tuition and savings plans (529 plans). For prepaid tuition plans, you need to report the name of the plan and sponsor, the value, and income (often, that's "none"). For 529 plans that allow you allocate your funds, report the underlying investment choices as separate items (e.g., Virginia Education Savings Trust 529 Plan, Dependent Child 1, Potomac Portfolio), and check the EIF box and report any income.
- \* Include all of your retirement accounts, including ones that you own or that you formerly participated in (IRAs, both Traditional and Roth), 401(K)s, 403(b)s. List the underlying holdings (cash account, mutual funds, stock, etc.). You can't just say "Schwab IRA."
- \* DO NOT include TSP (Thrift Savings Plan holdings) or other U.S. Government benefits (e.g., your EPA salary or your spouse's federal salary) on your form.
- \* If you have a vested beneficial interest (or your spouse or dependent children do) in a trust, for example, then you must have to report those assets. Oh, and if you're the trustee and are compensated, then you have to report the income on Schedule A and the position on Schedule D, Part I. Even if you are not compensated, then you have to report the position on Schedule D.
- \* Fully report annuities or ownership in TIAA-CREF Funds. If you have a fixed income annuity, please annotate your form with this information. If it's a variable annuity, report the underlying holdings (usually mutual funds) with names, valuations and amount of income (and check the EIF box). TIAA-CREF needs to be broken out by individual funds (e.g., TIAA Traditional Annuity, CREF Stock) with a valuation and amount of income for each. Don't forget to check the EIF (Excepted Investment Fund) box.
- \* Do not report term life insurance. Do report whole or universal life insurance by reporting the cash value and type/amount of income. If it's variable life insurance (e.g., you can invest in various subaccounts, usually mutual funds), then report the name, valuation and amount of income for each individual underlying holdings. Remember to check the EIF box if the underlying holdings are mutual funds

# SCHEDULE B, Part I

\* Check off the "none" box if applicable. Don't write "N/A" because, well, of course those sections apply to you!

## SCHEDULE B, Part II

- \* Report gifts from non-relatives. Gifts of travel accepted by OGC using the electronic travel acceptance form are not reportable by you on this form. Similarly, if OGC approved a gift under the Foreign Gifts and Decorations Act, then that is also not reportable by you. BUT if you attended a widely attended gathering during the reporting period, then that gift may be reportable! You need to find out if the ticket was worth \$350 or more, just like you have to examine all other gifts from non-relatives. You can exclude from the aggregation any gift of \$140 or less from the same source, but otherwise, have to report gifts from the same source that add up to more than \$350.
- \* I'm sorry, but we must abide by the Defense of Marriage Act, so even if your state recognizes same sex marriage, the federal government does not. You must report gifts from your roommate, significant other, same sex partner/spouse, friends, etc.
- \* Check off the "none" box if applicable. Don't write "N/A" because this section applies to you.

#### SCHEDULE C, Part I

- \* Report mortgages on any rental property, and report both the ownership of the property and any rental income on Schedule A.
- \* Check off the "none" box if applicable. Don't write "N/A" because this section applies to you.

#### SCHEDULE C, Part II

- \* Include any previous employer's retirement plan in which you are vested. We know that you are not contributing any money into it, but you still have to report it.
- \* Check off the "none" box if applicable. Don't write "N/A" because this section applies to you.

### SCHEDULE D. Part I

- \* Do not report any position you hold as part of your official EPA duties.
- \* But you MUST report tons of other positions, including serving as a trustee, director, employee, adjunct professor, editorial board member, president of a homeowners' association, etc.
- \* Check off the "none" box if applicable. Don't write "N/A" because this section applies to you.

## SCHEDULE D, Part II

\* This section applies only to new entrants. Incumbent filers and termination filers DO NOT complete this section. So most of you SHOULD NOT check off the "none" box here.